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5 **IN THE CIRCUIT COURT OF THE STATE OF OREGON**  
6 **FOR THE COUNTY OF BENTON**  
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**Filed**  
SEP 08 2014  
Benton County Circuit Court  
Corvallis, Oregon  
Entered \_\_\_\_\_

8 **STATE OF OREGON,**

**CASE No. 14CR16191**

9 Plaintiff,

**DECLARATION OF GINGER G.  
MOONEY**

10 v.

11 **WALEED ALI ALHARTHI,**

12 Defendant.  
13

14 I, Ginger G. Mooney, declare that the following facts are true and correct to the best of  
15 my knowledge and belief:

- 16 1. I am the attorney retained to represent the Defendant, Waleed Ali Alharthi, in the  
17 above-captioned proceeding.  
18 2. I have attempted to confer with opposing counsel on multiple occasions on this  
19 matter but have not yet received a response. Given concerns regarding assignment  
20 deadlines, time is of the essence. Thus, Defendant can no longer await opposing  
21 counsel's response.  
22 3. It is my understanding Defendant is present in the United States on a Student Visa  
23 and Scholarship awarded by the Cultural Mission of Saudi Arabia, and that good  
24 standing in these regards requires maintenance of certain academic standards. Access  
25 to the Internet is necessary for Defendant to obtain and complete school assignments,  
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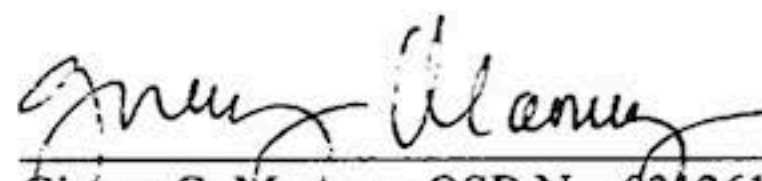
1 and to communicate with teachers, administrators, and the Cultural Mission of Saudi  
2 Arabia.

- 3 4. Additionally, Defendant is unable to access his finances due to present release  
4 conditions. Internet access is necessary for Defendant to transfer and withdraw funds  
5 from foreign banking institutions.
- 6 5. Finally, Defendant is currently without stable housing. Internet access is necessary  
7 for Defendant to seek and contact potential housing opportunities.
- 8 6. It is my understanding Defendant does not personally possess a laptop computer,  
9 desktop computer, telephone or any other electronic device with Internet access.
- 10 7. I am requesting Defendant's release conditions be amended to permit access to the  
11 Internet on campus facilities with campus electronics at Oregon State University or  
12 any other higher education institute where he is enrolled and any public library on a  
13 public terminal.
- 14 8. This motion is made in good faith and not for purposes of delay.

15 Pursuant to ORCP 1E, I hereby declare that the above statement is true to the best of my  
16 knowledge and belief, and that I understand it is made for use as evidence in court and is subject  
17 to penalty for perjury.

18 DATED this 4th day of September 2014.

19 VAN NESS, MOONEY LLC

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22 Ginger G. Mooney, OSB No. 031261  
23 Attorney for Defendant  
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